

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

CR19-197 DSD

v.

INFORMATION

DEBRA ANN DAGUE,

Defendant.

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 1349

24 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

COUNT 1

(Conspiracy To Commit Bank Fraud)

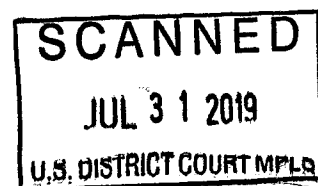
1. From at least in or about January 2018 and continuing through at least in or about June 2018, in the State and District of Minnesota, the defendant,

DEBRA ANN DAGUE,

and others known and unknown (collectively, the “co-conspirators”), did knowingly attempt and conspire to execute a scheme and artifice to defraud financial institutions, including, but not limit to, Unity Bank, Wells Fargo Bank, and Vermillion State Bank, all of which do business in the State of Minnesota, and to obtain, by means of false and fraudulent pretenses and representations, monies and funds owned by and under the custody and control of those financial institutions, in violation of Title 18, United States Code, Section 1349.

PURPOSE OF THE CONSPIRACY

2. It was the purpose of the conspiracy that the defendant and the co-conspirators would enrich themselves by fraudulently obtaining money from the accounts of victims held at various financial institutions by using stolen financial



instruments, such as checks, and unlawfully using the personal identification information of victims, including, but not limited to, their names, dates of birth, driver's license numbers, bank account numbers, and bank routing numbers.

MANNER AND MEANS

3. The manner and means of the conspiracy included:

a. The defendant and her co-conspirators would break into mail collection boxes, and take mail from residential homes, to steal checks and other financial instruments and use these items to unlawfully obtain money from the bank accounts of victims.

b. The defendant and her co-conspirators would obtain, from stolen checks and other sources, the names and personal identification information of victims who held accounts at financial institutions in the State of Minnesota and elsewhere.

c. The defendant and her co-conspirators would unlawfully obtain funds from the bank accounts of the victims in a variety of ways, including, but not limited to:

i. "Washing" the stolen checks using a chemical process to remove certain information from the checks, then modify them with dates, payees, dollar amounts, and/or signatures represented to be those of the victims, so that the defendant and her co-conspirators could negotiate the checks; and,

ii. Using information gathered from the stolen checks and other sources to print counterfeit checks that bore the victims' bank account numbers,

then either depositing the counterfeit checks into the defendant's bank account, or using these counterfeit checks to purchase pre-paid debit cards and high-end merchandise at a variety of retailers around the State of Minnesota. The high-end merchandise was sometimes returned for store credit or cash.

d. The defendant and her co-conspirators would assist each other by providing checks, other financial instruments, Minnesota driver's licenses, transportation, and other support, to obtain money from the victims' bank accounts and to further the unlawful scheme.

OVERT ACTS

4. In order to effect the objects of the conspiracy, and in furtherance of the conspiracy, the defendant and her co-conspirators committed and caused to be committed, in the District of Minnesota and elsewhere, numerous overt acts, including, but not limited to, the following:

a. On or about January 16, 2018, the defendant attempted to cause check number 11527, in the amount of \$2,321.69, bearing Unity Bank account number XXXXX5 2, which account belonged to victim M.D. Company, to be deposited in the defendant's Wells Fargo Bank account ending in 5293.

b. On or about January 17, 2018, the defendant caused check number 04371, in the amount of \$1,300, bearing Wells Fargo Bank account XXXXXX0981, which account belonged to victim M.M., to be deposited into a Wells Fargo Bank account owned and controlled by the defendant.

c. On or about January 29, 2018, the defendant caused check number 2274, in the amount of \$7,000, bearing Vermillion State Bank account number XXXXX3 8, which account belonged to victims C.W. and M.W., to be deposited into the defendant's Wells Fargo Bank account ending in 5293.

d. As a result of the execution of this scheme, from January 2018 through June 2018, the defendant and her co-conspirators, attempted and conspired to obtain at least \$47,000 from the accounts of victims by using, without lawful authority, the victims' personal financial instruments and personal identification information, to include names, dates of birth, driver's license numbers, bank account numbers, and bank routing numbers, to unlawfully have monies withdrawn from the accounts held by victims at various financial institutions.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATIONS

Count 1 of this Information is realleged and incorporated herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) as incorporated by Title 28, United States Code, Section 2461(c).

As the result of the offense alleged in Count 1, the defendant named in said Count shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation alleged in Count 1.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for

United States v. Dague

in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Date: July 31, 2019

ERICA H. MacDONALD
United States Attorney

A handwritten signature in black ink, appearing to read 'A. Chiquoine', with a long horizontal flourish extending to the right.

BY: ALEXANDER D. CHIQUOINE
Assistant U.S. Attorney
Attorney ID No. 0396420